

EXHIBIT D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LI RONG GAO, SHU F. JIANG, and XIAO
HONG ZHENG,

individually, and on behalf of all others
similarly situated,

WEI S. TAN and WEI J. WU, individually,

Plaintiffs,

v.

PERFECT TEAM CORPORATION d/b/a
GUANG ZHOU RESTAURANT, JI SHIANG,
INC, d/b/a GUANG ZHOU RESTAURANT,
FENG LIN, CHUN KIT CHENG a/k/a JUN JIE
ZHENG, JIA LI WANG, and ZHUO PING
CHEN a/k/a CHEUK PING CHEN,

Defendants.

Civil Action No.
10-CV-1637 (ENV) (CLP)

**DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO
RULE 26 (1)(A)**

Defendants PERFECT TEAM CORPORATION, CHUN KIT CHENG, and JIA LI WANG, hereby submit the following initial disclosures, pursuant to Fed. R. Civ. P.26(1)(A), subject to corrections, updating, and supplementing as the need to do so arises, as required under the Rules:

1. 26(a)(1)(A)(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:


NONE.

2. 26(a)(1)(A)(ii) a copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

See documents previously provided, which documents may contain proprietary information or trade secrets, and are HIGHLY CONFIDENTIAL, and are disclosed herein subject to and upon the condition that they will not be used or disclosed except in this litigation, and then only insofar as is absolutely necessary:

1. Tip notebook/ledger bearing Bates Numbers GAO000001-81.
2. Documents, Bates Numbered PTC000001-62.
3. Documents produced by predecessor counsel.

Dated: Queens, New York
February 11, 2011



SAMUEL CHUANG, ESQ. (SC 5114)
Law Offices of Samuel Chuang, Esq.
135-11 40th Road, Suite 4C
Flushing, NY 11354
(718) 353-4700
Fax: (212) 202-4527
Email: samuel.chuang@chuanglaw.com
*Attorney for Defendants Perfect Team
Corporation, Chun Kit Cheng, and Jia Li
Wang*